

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

:
:
: MDL 2804
:

This document relates to:

: Case No. 17-md-2804
:

Track One Cases

: Hon. Dan Aaron Polster
:
:

DECLARATION OF PAUL ANDREW PYFER

Paul Andrew Pyfer, of full age, hereby declares, pursuant to 28 U.S.C. §1746, as follows:

BACKGROUND

1. I make this Declaration for the purpose of setting forth certain facts in support of the Motion of Non-Party Paul Andrew Pyfer Objecting to Plaintiffs' Listing of Pyfer as a Live Stream Witness, which is being filed contemporaneously herewith in the above-captioned action.

2. I have personal knowledge of the facts set forth in this Declaration.

3. I reside in Wayne, Pennsylvania.

4. I was employed by Cephalon, Inc., a predecessor entity of Teva Pharmaceutical Industries, one of the Defendants in this action, from approximately November 2000 through February 2010.

5. In March 2010, I entered into a separation agreement with Cephalon that was effective as of February 28, 2010.

6. I have never been affiliated with any of the Defendants in this action aside from my employment with Cephalon nearly a decade ago.

7. I am not represented by counsel for any of the Defendants in this action.

8. I am currently the minority owner of an approximately 250-person full service advertising agency, Fingerpaint, with offices in Pennsylvania, New York, New Jersey, and Arizona.

9. In my capacity as a Partner at Fingerpaint, I have oversight responsibility for both the Conshohocken, Pennsylvania and Phoenix, Arizona offices of my company, and I manage the day-to-day operations of the company.

10. My responsibilities include corporate marketing and mergers and acquisitions.

11. My corporate marketing responsibilities include all corporate promotion and thought leadership activities, as well as the rollout of our new corporate campaign in the fourth quarter of this year.

12. My mergers and acquisitions responsibilities include managing the process of our acquisition of a LaJolla, California based company, for which I am presently overseeing all non-financial aspects of the acquisition and eventual integration.

13. The acquisition referenced above should be finalized within the next month, which will require significant advance preparation of: website, press release, updated biographies, creative support build-out plan in Phoenix, full integration plan for human resource elements (e.g., payroll, 401K, healthcare and other benefits). This is a highly time-intensive, detail-oriented activity that will require my attention over the next 6 weeks.

14. Over the next six weeks (from October 14, 2019 through December 1, 2019), my company has four potentially destiny-changing “pitch” opportunities in locations throughout the United States, which I must personally oversee and lead.

15. The pitch opportunities are the lifeblood of my company and represent potential fee income of \$10 million annually.

16. As a fee-for-service agency that is currently overstaffed in two of four offices by as many as 22 employees (due to normal client attrition and other business dynamics), winning or losing the pitches will mean the difference between jobs kept or lost for many of my company's employees.

17. In addition to the above-referenced four "pitch" opportunities we also have multiple other opportunities, which are also relevant and important to the success of my business.

18. My team relies on me to lead and direct these efforts, which require a significant dedication of time, effort, and focus.

19. I will be running a two-day leadership meeting for my company on October 22 and October 23, 2019.

20. Thirty people will attend this leadership meeting, and travel is already booked and paid for.

21. I take my responsibilities as a small business owner very seriously, and to heart.

22. I treat my employees like family, and they rely on me to "take care" of them – *i.e.*, keeping them employed and paid fairly.

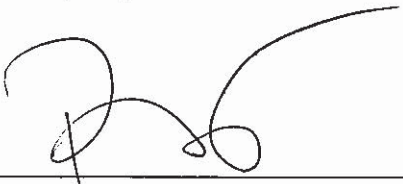
23. At this critical time for my business, I cannot afford to devote less than 100% of my time to the efforts of my team.

24. Time spent preparing for testimony in this trial, and testifying as a witness, will have an extremely detrimental impact on my business, potentially cripple my organization, and reduce the chances of winning much needed business opportunities through multiple pitch efforts.

25. The Plaintiffs in this action deposed me over the course of 7 hours on February 20, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2019



PAUL ANDREW PYFER